

Mr Ian Rae
London Borough of Hounslow
By email

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Dear Ian,

**Character Area 14. Great West Road.
Response to Consultations by the
Brentford Community Council.**

**Ref BCC 679
May 13 2014**

We note that the Local Plan (Proposed Submission March 2014) includes Policy CC2 (e) which states that "(the Council) will work with local communities to understand and improve the urban design of their areas..."

It is in this spirit that the BCC provides comments on the Character Area Study 14 with particular reference to character reaches B, C and D, from Chiswick roundabout to Gillette Corner.

The BCC considers that this useful draft report could be strengthened by bringing out some central points about the Character of the Great West Road and we would suggest that the following might be included in the introduction:

1. The Great West Road, although built in sections, originally read as a unified urban space, which is still clearly seen in reaches C and D.
2. This space is still roughly defined by its fairly constant width, the scale or it's original buildings and the height of the, now, mature trees in the open areas.
3. Those newer high rise structures, which have not been designed to enhance their immediate environment, interrupt this continuity and compromise the quality of the total urban space.
4. Proposed new structures, on reaches C and D, should be designed as part of an integrated 3 dimensional master plan which seeks to re-establish and develop the original concept.
5. The construction of the elevated M4 has blighted the street environment below, particularly in reaches B and C. The viaduct is over-loaded and contributes to the noise and the polluted air quality of the A4/M4 corridor. It increases the hostility of the street level environment and the separation of residents on the south of the A4 from Carville Park North and Gunnersbury Park.
6. The GWR was originally lined by prestigious industries. When the use class order was amended (B2) many were replaced by offices. Those developed for company HQs with good travel to work plans have

- survived. Speculative applications have either not been built out or have remained under occupied or empty. The poor access (PTaL 2 or 3) has contributed to this problem.
7. Increasing demands for London housing sites led to the Council agreeing, despite the high pollution levels, to the inclusion of housing on some GWR sites. Pollution levels continue to increase and it is only possible to provide suitable indoor environments by special measures.
 8. The Character Study does bring out the importance of quality detail features (like to original SKB railings) to the overall character of the GWR.
 9. The harmful effect of advertising needs to be more fully demonstrated.
 10. The report does show the benefit of open spaces and well landscaped areas, but does not suggest how further landscaping could improve the environment.
 11. The report does not mention the disruptive effect of granting consents to buildings (eg car show rooms) which are designed to draw attention to themselves at the expense of the total urban context.
 12. This character study should include a detailed study of the impact of the A4/M4 corridor on the surrounding (mostly low rise residential developments) to ensure that any new proposals are evaluated for their impact on the A4/M4 and on the adjacent community.
 13. This character study is superimposed over Character Areas L, D & K, B, H and G (going east to west) Neither the Local Plan nor in the introduction set out which text should be used by applicants and by planning officers in assessing whether any new development proposals respect the urban character of their area.

Please note all references are to the page/paragraph and line of the Council document.

Land Use Maps Pages 14, 22 and 30.

The map for Character Reach B (page 14) shows as "opportunity sites" land for which planning consent has been or is in course of being given. The site adjacent to Chiswick roundabout has consent for an office and advertising structure and the land within the railway triangle for a stadium and high rise residential. The other two sites have consents for car showrooms.

The map for Character Reach C (page 22) similarly shows the Alfa Laval site. It is now being built out for a mixed residential and commercial development.

The map for Character Reach D (page 30) shows excessive retail located, against policy, outside of designated town centres. It does not show the existing shops within the Glaxo site.

In general it would be useful to show all Listed and potentially Listed buildings on the plans, which should also show the Conservation Areas. The term

“heritage fringe” (page 18) is not defined in the text. Details of heritage buildings in the area have been prepared by the Brentford Community Council and could be incorporated, if required.

Underlying Factors:

1. Traffic.

The A4/M4 corridor carries heavy commuter traffic and is the principal access from Heathrow and the west to London. TfL studies show that recent developments on the corridor and on Brentford High Street are over-loaded and that capacity for additional development will be heavily constrained until the road capacity and the Public Transport Accessibility levels are improved. These changes could affect the setting and character of the structures facing the Great West Road.

2. Pollution Air Quality.

The UK is facing fines from the high levels of pollution, which are particularly serious in the major London radials including the A4/M4 corridor. This makes the immediate environment unsuitable for residential development and for pedestrian movements especially for asthma sufferers.

The text should state the need for adequate measures to lower pollution levels, and if necessary to restrict development to prevent increasing the problem.

3. Noise.

Traffic noise from the A4 and the elevated M4 produce high noise levels, which make the road space unsuitable for pedestrians, for the quiet enjoyment of gardens and balconies or for buildings with open windows.

Sound screens on the M4 on the continental model could reduce noise nuisance.

4. The M4.

The whole of reach B is dominated by the elevated M4. This is an alien structure which debases the environment below it and the setting of the buildings to each side.

5. Advertisements.

The road is overwhelmed by excessive advertising features, which will be further encouraged by the consent given for the "Octopus" close to the Chiswick roundabout.

6. Mixed Use and Residential.

The A4 was cut through older residential properties. Some remain eg 23/i Some Council buildings were converted to residential, eg 29/vii, but land use policy was to site employment uses on the A4.

When it was apparent that applicants who obtained consents for new offices (Alfa Laval) could not obtain finance to build them the Council reluctantly allowed mixed use developments, starting with the Great West Quarter, which was to be "employment led" as the developer re-located his regional offices to the site.

Traffic congestion, poor access and low PTaLs were also factors in discouraging office developments.

Special measures to protect residents from the pollution were included, but these could not protect residents in the open spaces.

6. Visual Impact.

The A4/M4 Corridor not only needs to be understood as the urban environment of a principal access to London, but also as an alien element in the low rise residential character and scale of the surrounding areas to the north and south. These are also considered in the Character Study for Brentford.

As the A4 rises to Gillette Corner the skyline becomes more significant, as any landmark buildings (such as the listed Gillette clock tower) are important elements in distant views. (See page 33/1/8).

The same sensitivity is required in considering those sections of the road passing close to Gunnersbury Park (see 17/1/4) and Boston Manor Park where long views have already harmed these heritage estates.

The tower to the Great West Quarter is also harmful to the Grade I listed Syon House and estate and to the World Heritage site at Kew Gardens.

Specific Comments.

(note these also refer to page/ paragraph/ line of the council document.)

15/1/2 Golden Mile.

The Golden Mile (see 2/B) was lined with prestigious (later listed) buildings well set back from the then (1920s) new road, effectively providing a harmonious Integrated urban design.

Since then consents have been given for buildings of varying quality to maximise the development potential at the time they were designed, without regard to any over-all concept, any guidance on the location of tall buildings or any design constraints. The result has been to produce a series of dissimilar structures each vying for the attention of those driving in from Heathrow.

While individual buildings such as the Glaxo SKB office complex have achieved high standards of design and generous settings (plot ratio 1.37:1) others have debased their surroundings (see 31/iv).

Page 15.

The descriptions given are so general as not to define the character of reach B and should be re-written.

A more helpful text would describe the heights, settings and styles of the commercial buildings east of Carville Park, the open character of the park, the high rise Great West Quarter/Alfa Laval frontage and the low rise industrial estate to the north and to link these descriptions to the map on page 14.

As consents have been agreed for the Stadium and the 11 high rise blocks of "enabling development" this should also be included in the description.

Page 17.

17/2/1. It is also important to describe how the overwhelming M4 viaduct dominates the environment of the A4. Despite the efforts to design the underside of the viaduct, the heaviness of the structure dominates the space beneath to the detriment of pedestrian or cycle routes and makes it an unsuitable environment for residential development.

17/215. The "severance" is becoming more significant as residential and mixed use developments, which depend for recreation on Gunnersbury Park and Carville Hall Park north are occupied.

No comments are included on the impact of Reach B developments on the surrounding residential streets and open spaces.

Illustrations on page 17 clearly show that insensitive vertical structures, large (17/vi) or small (17/iii) can have an inappropriate impact, but this is not brought out in the text.

Some, but not all, of the "listed buildings" are listed in the text. It would be useful to show them all on the plans, which do show the Conservation Areas. The term "heritage fringe" (page 18) is not defined in the text. Details of heritage buildings in the area have been prepared by the Brentford Community Council and could be incorporated, if required.

Page 20.

20/2/3. does not describe the sub-standard environment illustrated at 23/iv, although it is set out at 27/iii.

20/4/1. The lack of mature trees contributes to the poor environment.

20/4/1 Cycling is not safe as it is not clear to motorists and cyclists which direction cycling is permitted despite a fatal accident.

Page 22.

22/1/3. Please see our comments: Underlying factors 6 (above).

22/4/1. It might be advisable to omit reference to the "banner", which depends on a temporary consent, as this will be a reference document during the period of the Local Plan.

22/6/7. The sub-standard university premises almost touching the motorway viaduct need a more objective description.

It is noted that no mention is made of the office block on the SE corner of The A4/Boston Manor Road junction, which has been empty since it was built some 20 years ago.

Page 24.

24/3/1 and 25/vi show the gardens facing the A4, which are heavily polluted and suffer from the noise of both the A4 and the M4, but which could be screened. The footpath to the A4 is not overlooked and could be a hazard for pedestrians at night.

It is noted that, although the paper illustrates residential development near the A4, it does not consider the impact of the higher structures adjacent to the road on the residential areas or open spaces.

Page 26.

26/5/1 The mix of buildings shows the lack of an urban design policy to guide planning consents.

Page 29.

29/1 shows the Alfa Laval tower before it has been refurbished. It does not show that the remainder of the site has been designed to address both the scale of the motorway on the north and the domestic scale of the adjacent streets on the south. Similar scaling down will be needed if buildings on the A4 are to be acceptable neighbours to the existing residential areas.

Page 30.

In Urban design terms Reach D is the most successful part of the Great West Road. It retains an open quality, with the larger buildings (ie Glaxo SKB) well set back on large, well landscaped sites. The sculpted retaining wall to the Curry/PC World raised car park emphasises the strong horizontal lines. The effect is not helped by the aggressive black and white offices (31 vi) close to the back edge of the pavement.

The text should welcome this character both because it preserves the original intention of the 1920 Golden Mile, but also as a guide for the scale, density and character for any future development.

Pages 31/33.

None of the views, nor the script demonstrate the long horizontal lines in the views up the GWR. These are emphasised by the long elevation of the "Pyrene" and "Curry's" building, the new retaining wall to the former "Firestone" site and the long lower wings of the set back Glaxo/SKB offices. This should be achieved by including views looking west.

In the last paragraph of Page 33, the residential buildings are in reach C, not reach D.

Page 36.

We accept that the set back and car parks of the buildings on the south side of the A4 approaching Syon Lane do not contribute to the character of this stretch. However, they do offer opportunities for landscaping and for sensitive highway improvements at that junction. This should be in the context of a co-ordinated urban design which respects the scale and character of the listed Gillette building and the undisturbed prominence of it's clock tower.

Summary.

The Brentford Community Council requests that you incorporate these comments in the final version of this character study.

Yours sincerely

Denis Browne
Chairman, Planning Consultative Committee
Brentford Community Council.